

Attachment “A”

To

**Post-Hearing Brief of Respondent,
SALEM HOSPITAL CORPORATION**

NLRB CASE NO. 04-CA-130032

Respondent Exhibit 2 Summary

Inspira Health System

RN staff positions posted from June 1, 2014 to October 15, 2015

There were 854 open RN staff positions posted from June 1, 2014 to October 15, 2015. The open RN staff positions posted required New Jersey RN licensure and were located at the Inspira facilities listed in the table below.¹ The open RN staff positions included 411 Full-time, 185 Part-time, and 258 Per Diem positions. Of the 854 open RN staff positions, 96 were in the maternity department, Labor/Delivery Room, NICU or Women's/Children's Ops; the remainder were in departments for which the Claimants met qualifications.² All open positions were posted externally on the Inspira Health System's website for both external and internal applicants.³

	Full-Time	Part-Time	Per Diem	Maternity	Vineland	Bridgeton	Woodbury	Elmer	Other ⁴
2014									
June	35	5	26	7	30	6	27	2	1
July	38	6	21	1	38	3	22	2	-
Aug	29	16	17	9	30	2	25	4	1
Sept	14	13	15	4	13	3	16	6	4
Oct	9	17	6	3	21	1	6	2	2
Nov	12	5	12	1	13	1	11	2	2
Dec	10	5	9	2	13	-	8	1	2
2015									
Jan	23	14	16	1	27	4	11	9	2
Feb	19	14	5	3	12	4	18	2	2
March	31	17	22	12	38	-	26	5	1
April	13	9	18	5	17	2	14	3	4
May	26	8	10	7	25	-	15	-	4
June	19	5	9	3	15	-	12	6	-
July	34	18	24	9	29	1	37	3	6
Aug	45	14	15	8	34	2	28	6	4
Sept	37	12	20	14	39	2	19	6	3
Oct	17	7	13	7	11	1	18	4	3

¹ These are all RN positions that require licensure in New Jersey. (T.512.)

² The other departments referenced include: Medical/Surgical, Family Medicine Center, Life Center Clinic, Pediatrics, Post-Anesthesia Care, IV Therapy, Same Day Surgery, Surgical Services, Surgical ICU, Surgical Step Down, TCU (Transitional Care Unit) Sub Acute, Wound Care & Center, Orthopedics, Medical Step Down, ACC/Endoscopy, GI Center, Surgery Centers, ICU/CCU, Intermediate Child/Adolescent, Pre-admission Testing, Home Care & Hospice, Medical Acute, PCU (Progressive Care Unit/Step Down), Medical ICU, Cardiac Acute, Cardiac ICC, Cardiac Step Down, Cardiac Catheterization, Cardiac Rehabilitation, Child/Adolescent MHU, Crisis Center, Dialysis, Emergency Room, Mental Health, Operating Room.

³ Postings are made on the Inspira website and picked up by Indeed.com. (T.514.)

⁴ The category "Other" includes the homecare/hospice, medical and surgery centers in Salem, Gloucester County, Mullica Hill, Millville, Oak & Main.

Respondent Exhibit 4 Summary

Jefferson Health NJ/formerly Kennedy Health System

RN staff positions posted from June 1, 2014 to October 15, 2015

From June 1, 2014 to October 15, 2015 there were 390 total RN staff positions posted for various Kennedy-Jefferson campus locations identified below in each month of the alleged backpay period (not including supervisory or administrative postings).¹ These job postings are comprised of 353 regular Full and Part-time positions and 37 Per Diem/supplemental positions.²

Of the 390 open RN staff positions, 35 postings were for RN staff positions in the OB/GYN, Neo-Natal or Labor & Delivery department. The remaining postings for RN staff positions were in departments for which the Claimants met qualifications.³

Website and employee referrals accounted for 251 positions filled; 139 are noted as internal transfers.

All positions are posted externally and can be seen by all applicants—including those that were subsequently filled by internal transfers. (T.626-627.)

	RN Staff positions (All Full and Part-time)	RN Per Diem	RN OB/GYN	RN Internal Transfers And How many were OB/GYN	Hire Source External ⁴ And How many were OB/GYN	Cherry Hill	Kennedy-Voorhees/Kennedy - Surgical/Kennedy-KMPG	Stratford	Washington-Township	Stat Medical
2014										
June	25	6	5	11 (1 was OB/GYN)	20 (4 were OB/GYN)	3	1	4	17	-
July	29	4	2	15 (1 was OB/GYN)	18 (1 was OB/GYN)	6	5	10	8	-
August	38	2	6	22	18 (6 were OB/GYN)	6	2	4	26	-
Sept	18	-	1	7	11 (1 was OB/GYN)	3	3	3	9	-
Oct	21	-	4	8 (1 was OB/GYN)	13 (3 were Ob/GYN)	5	2	2	12	-
Nov	14	-	-	4 -	10 -	3	-	1	9	1
Dec	16	7	3	5 -	18 (3 were OB/GYN)	-	4	1	11	-

¹ Only the Health Care Center in Turnersville is not listed here—they had no positions for this time period.

² Data does not differentiate Full and Part-time positions nor provide specific locations for per diem staffing.

³ CAPU/Adolescent Psych, Crisis RN, Emergency Services, Renal Dialysis, Endocrinology, ICU, Medical/Surgical, Radiology interventional, Recovery Services, Surgery Services, PCU(Progressive Care Unit), Same-day Service, SICU(Surgical Intensive Care Unit, Surgery Center.

⁴ External sources include Kennedy website, Indeed, walk-in, employee referral, job fair and other. (T.633-634)

	RN Staff positions (All Full and Part- time)	RN Per Diem	RN OB/GYN	RN Internal Transfers And How many were OB/GYN	Hire Source External And How many were OB/GYN	Cherry Hill	Kennedy- Voorhees/ Kennedy - Surgical/ Kennedy- KMPG	Stratford	Washington- Township	Stat Medical
2015										
Jan	16	-	-	6	10	6	1	2	7	-
Feb	21	1	4	11 (2 were OB/GYN)	11 (2 were OB/GYN)	3	2	2	14	1
March	23	3	4	11 (1 was OB/GYN)	15 (3 were OB/GYN)	4	3	4	12	-
April	21	4	2	9 -	16 (2 were OB/GYN)	5	3	1	12	-
May	25	-	2	7 -	18 (2 were OB/GYN)	11	-	2	12	-
June	21	7	-	5 -	23 -	3	1	4	13	-
July	15	-	-	4 -	11 -	6	-	1	8	
Aug	17	-	1	4 (1 was OB/GYN)	13 -	5	1	3	8	-
Sept	26	2	1	7 -	21 (1 was OB/GYN)	8	1	4	13	-
Oct	8	-	-	3 -	5 -	4	-	1	3	-

Respondent Exhibits 24 & 25 Summary
Cape Regional Medical Center
RN staff positions posted from June 1, 2014 to October 15, 2015

There were 462 open RN staff positions from June 1, 2014 to October 15, 2015.¹ All 462 open RN staff positions were represented by 252 external postings online within this time period.² The 462 open RN staff positions were comprised of 226 Full-time, 30 Part-time and 206 PRN (Per Diem). Of these, 22 were in OB/GYN-related departments (9 Full-time; 11 PRN; 2 Part-time) and the remainder were in departments for which the Claimants met qualifications.³

	RN positions open/posted⁴	Full-Time	Part-Time	PRN	OB/GYN- Full-time PRN Part-time	Week of
2014						
June	20/12	10	2	8	1 FT 1 PRN	6-30-14
July	25/13	14	2	9	1 FT 1 PRN	7-28-14
Aug	25/9	7	2	16	1 FT 3 PRN	8-11-14
Sept	27/9	6	3	18	1 FT 2 PRN	9-9-14
Oct	15/6	7	-	8	-	10-6-14
Nov	31/21	20	1	10	-	11-3-14
Dec	18/11	10	1	7	1 FT -	12-22-14
2015						
Jan	19/13	12	1	6	-	1-26-15
Feb	24/16	14	2	8	-	2-23-15
March	26/16	14	2	10	-	3-30-15
April	26/15	13	2	11	-	4-20-15
May	32/20	18	2	12	-	5-25-15
June	39/25	23	2	14	-	6-8-15
July	39/22	21	2	16	- 1 PRN	7-20-15
Aug	34/16	13*	2	19	1 FT 1 PRN	8-24-15
Sept	31/14	12	2	17	2 FT 1 PRN 1 PT	9-29-15
Oct	31/14	12*	2	17	1 FT 1 PRN 1 PT	10-12-15

¹ In order to avoid duplication, monthly tallies reflect the week with the highest number of open and posted positions in that month. (T.896-897; R.Ex 24&25.)

² A single posting often represents numerous open RN positions with the same job title and the posting could remain online until positions were filled. (T.880; 897; 907; R.Ex 24&25.)

³ The other departments referenced include: PCU (Progressive Care Unit), PACU (Post-Anesthesia Care Unit), Emergency Room, Recovery Room, Medical/Surgical, Operating Room, ICU, Nursing Admin (RN Float Pool), Same Day CC, Critical Care.

⁴ This column shows the number of open RN positions to the left of the slash(/) and the number of external job postings which represented them to the right of the slash. See footnote 2 above.

Respondent Exhibit 27 Summary

Virtua

RN staff positions posted from June 1, 2014 to October 15, 2015

There were 815 open RN staff positions posted from June 1, 2014 to October 15, 2015. These open RN staff positions were comprised of 226 Full-time, 289 Part-time, and 300 Per Diem. Of the 815, 120 RN staff positions were open in maternity and OB/GYN-focused departments.¹ The remaining open RN staff positions were in departments for which the Claimants met qualifications.²

	Full-Time	Part-time Benefits budgeted	Part-time limited	Per Diem	Temp	Home Health Visits ³	OB/GYN	Berlin	Camden	Marlton	Moorestown	Mt Holly/Memorial	Mt Laurel	Sewell	Voorhees
2014															
June	4	11	-	3		1	5	-		-		11	5		3
July	2	8	-	5		-	1	1		2		8	4		-
August	4	7	1	7		1	3	-		4		7	1		8
Sept	11	20	1	6		-	8	1	1	4		10	1		21
Oct	6	13	1	12		-	9	-		3		11	-		18
Nov	6	13	-	13		-	12	-		1	2	5	-		24
Dec	9	24	2	18	1	-	9	1		1		21	12		30
2015															
Jan	12	15	-	37		1	10	2	-	16		28	4		15
Feb	13	10	-	14		-	2	-	-	7		8	1		21
March	14	15	-	11		-	11	-	1	6	1	15	-		17
April	20	24	-	29		2	8	1	6	19		12	6		31
May	33	17	4	41		-	6	1	3	24		18	-		49
June	26	33	1	32		-	8	5	2	33		13	5		34
July	25	18	2	31		1	6	3	-	11		14	5	1	43
Aug	10	23	2	24		-	10	1	-	13		10	1		34
Sept	13	13	-	13		14	6	-	-	6	1	14	17		15
Oct	18	11	-	4		1	6	-	-	7		11	1		15

¹ Maternity and OB/GYN-focused departments included: 3 Stokes Mother/Baby, Delivery Room, Center for Women and Child, High Risk OB, Labor & Delivery, Labor & Delivery Triage, Mother/Baby Units, NICU, Special Care Nursery.

² Besides Maternity and OB/GYN, the other hiring departments included: Medical/Surgical, Operating Room, PACU & SPU (Post Anesthesia Care Unit), Ambulatory Surgery Center, Nursing, Observation Unit, Endoscopy, Special Diag Imaging, Short Procedure Unit/SAA/Same Day Surgery, Surgery, Surgical Services, Endoscopy, PACU (Post-Anesthesia Care Unit), Progressive Care Unit, Pediatrics, Skilled Nursing – Home Health, Float Nurses, Orthopedics/Stroke, Emergency Department/Services, EKG, I.V. Therapy, Oncology/Ace Unit, Behavioral Health, Long Term Care, Sub-Acute, Cardiac Cath Lab, Cardiac Catheterization, Cardiac ReHab, Cardiac/Telemetry, Certified Health Svc (CNS) Critical Care, ICU, Infectious Disease, Radiology Special Procedures, Recovery Room, Renal, Virtua Physician Practices.

³ Of the 837 RN staff open positions, 21 were categorized as home health care visits.

Respondent Exhibit 39 Summary

Genesis Healthcare: Millville Center

RN staff positions posted from June 1, 2014 to October 15, 2015

There were 14 job descriptions for open RN staff positions at Millville Center from June 1, 2014 to October 15, 2015. These were comprised of 7 Full-time, 5 Part-time, and 2 Per Diem positions and were posted internally and externally on the Millville Center's Genesis Career site. Millville does not have an OB/GYN or Labor & Delivery department. The open RN staff position job description postings specified Post-Acute Care and working with Rehabilitation patients.

	Full-time	Part-time	Per Diem	Total RN Positions Posted
2014				
June	1	1	-	2
July	-	2	2	4
August	-	-	-	-
Sept	-	-	-	-
Oct	-	-	-	-
Nov	2	-	-	2
Dec	-	2	-	2
2015				
Jan	-	-	-	-
Feb	-	-	-	-
March	-	-	-	-
April	-	-	-	-
May	2	-	-	2
June	-	-	-	-
July	-	-	-	-
Aug	2	-	-	2
Sept	-	-	-	-
Oct	-	-	-	-
Grand total	7	5	2	14

Respondent Exhibit 40 Summary

Salem Memorial Hospital

RN staff positions filled from June 1, 2014 to October 15, 2015

From June 1, 2014 to October 15, 2015 there were 38 RN open staff positions filled by new hires.¹ Of these, 30 were Full-time, 1 was Part-time, 7 were PRN.² Since the OB department closed OB/GYN positions were not filled. The departments in which the RN staff positions were filled included positions for which the Claimants met qualifications: Medical/Surgical, Emergency Services, Infection Control, and Intensive Care Unit. (T. 1045-49; 1056).

2014	Full-time	Part-time	PRN	RN positions filled
June	1	-	-	1
July	-	-	-	-
August	3	-	-	3
Sept	4	-	-	4
Oct	5	1	1	7
Nov	-	-	-	-
Dec	1	-	-	1
2014 total	14	1	1	16
2015				
Jan	3	-	1	4
Feb	3	-	-	3
March	1	-	1	2
April	2	-	1	3
May	1	-		1
June	-	-	-	-
July	1	-	1	2
Aug	-	-	1	1
Sept	1	-	1	2
Oct	4	-	-	4
2015 Total	16	-	6	22
Grand total	30	1	7	38

¹ In this summary, only positions with a hire date listed within our time period were included. There was no document available which could identify the number of RN staff positions posted during that time period. (T.1195).

² PRN=Per Diem

Respondent Exhibit 41 Summary

Jennersville Hospital

RN staff positions filled from June 1, 2014 to October 15, 2015

There were 55 open RN staff positions filled from June 1, 2014 to October 15, 2015. Of these, 20 were Full-time, 18 were Part-time and 17 were PRN.¹ There were 13 Labor & Delivery open RN staff positions filled (2 Full-time; 6 Part-time; 5 PRN) and the remainder of RN open staff positions filled were in departments for which the Claimants met qualifications.²

2014	Full-time	Part-time	PRN	RN positions filled	RN Labor & Delivery Positions Filled
June	1	1	-	2	1 FT 1 PT 1 PRN
July	-	1	-	1	-
August	2	1	1	4	-
Sept	6	1	2	9	-
Oct	-	-	1	1	-
Nov	-	-	1	1	-
Dec	1	-	1	2	-
total	10	4	6	20	3
2015					
Jan	1	1	1	3	1 PT 1 PRN
Feb	-	1	1	2	-
March	-	1		1	-
April	1	-	1	2	1 PRN
May	2	-	1	3	-
June	1	-	2	3	1 PRN
July	-	-	-	-	
Aug	1	3	4	8	1 FT 1 PT 1 PRN
Sept	1	2	1	4	1 PT
Oct	3	6		9	2 PT
total	10	14	11	35	10
Grand total	20	18	17	55	13

¹ PRN=Per Diem

² Departments referenced include: Medical/Surgery, Physician Clinic, Emergency Services, Recovery Room, Operating Room, Intensive Care Unit, Infection Control, Telemetry.

Respondent Exhibit 42 Summary

Chestnut Hill Hospital

RN staff positions filled from June 1, 2014 to October 15, 2015

There were 167 open RN staff positions from June 1, 2014 to October 15, 2015. These open RN staff positions were comprised of 103 Full-time, 23 Part-time, 41 PRN (Per Diem). An OB/GYN department was not specified. The 167 RN open staff positions were available in departments for which the Claimants met qualifications, including: Medical/Surgery, Emergency Services, Recovery Room, Operating Room, Physician Clinic, ICU, Telemetry, Psych DPU.

	Full-time	Part-time	PRN	RN positions filled
2014				
June	8	2	2	12
July	17	2	7	26
August	1	1	2	4
Sept	4	-	1	5
Oct	7	1	3	11
Nov	5	-	1	6
Dec	6	1	-	7
total	48	7	16	71
2015				
Jan	1	1	1	3
Feb	7	-	4	11
March	5	4	-	9
April	7	2	5	14
May	3	1	3	7
June	2	2	5	9
July	12	1	-	13
Aug	2	2	4	8
Sept	6	3	2	11
Oct	10	-	1	11
total	55	16	25	96
Grand total	103	23	41	167